

From: Mike O'Hara <Mike@hacmb.org>
Sent: Thursday, July 18, 2019 3:32:39 PM
To: Marisa Button
Cc: Miguell Del Campillo
Subject: RFA 2019-103 – Public Comments - July 18, 2019

Dear Ms. Button,

Thank you for allowing the Housing Authority of the City of Miami Beach (HACMB) to provide comments on RFA 2019-103 - Community Development Block Grant-Disaster Recovery (CDBG-DR) for Small Developments in Areas Deemed Hurricane Recovery Priorities.

The following comments are in regards to the 6-26-19 Draft of RFA 2019-103:

3. d. (1) – page 11 of 106:

Public Housing Authorities are exempt from the requirements of Chapter 475, Florida Statutes – please see 475.011 Exemptions –
http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=0400-0499/0475/Sections/0475.011.html

Any establishment operated by a Public Housing Authority regulated under Chapter 421, F.S. is also exempt from DBPR license requirements – please see <http://www.myfloridalicense.com/DBPR/services-requiring-a-dbpr-license/>

Please confirm that a Public Housing Authority with the relevant management experience is eligible to serve as the General Management Company.

4. c. – page 13 of 106:

Please note that Mid-Rise (4, 5 or 6 stories) is not included as an allowable development type. Please confirm that Mid-Rise developments are eligible.

Exhibit F – 5. e. – page 90 of 106:

Public Housing Authorities are unable to meet the 151 calendar day requirement for submission of audited financial statements. Audited financial statements for PHAs are due 9 months after the PHA's fiscal year end – please see § 902.33 Financial reporting requirements -
<https://www.law.cornell.edu/cfr/text/24/902.33> Please consider revising the deadline for PHA applicants.

Exhibit F – 8. b. – page 98 of 106:

It appears that this section regarding rents applies to HOME funded projects. Please confirm that this section is not applicable to CDBG-DR funded projects.

Thank you.

Mike

Michael O'Hara, *Director of Housing Development Programs*

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